

January 03, 2022

Via e-mail to rule-comments@sec.gov

Ms. Vanessa Countryman
U.S. Securities and Exchange Commission
100 F Street, NE
Washington DC 20549-1090

Re: Electronic Recordkeeping Requirements for Broker-Dealers, Security-Based Swap Dealers,
and Major Security-Based Swap Participants
Release No. 34-93614; File No. S7-19-21

Dear Ms. Countryman:

Thank you for the opportunity to provide comments to the SEC Proposed Amendments to Rule 17(a)4.

The American Council of Life Insurers (ACLI) generally supports the Proposed Amendments and broadly supports comments submitted by SIFMA and the Committee of Annuity Insurers.

Thank you for allowing us to participate in the important inquiry. Please let us know if you have any questions or require any additional information.

Very truly yours,



Patrick C. Reeder
Deputy General Counsel



Ian Trepanier
Policy Analyst